

Savannah Scoville
PO Box 4805
Incline Village, NV 89451-9997
savannahscoville@gmail.com
(712) 577-1496

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

-----X
In re:
SCOTT A. CORRIDAN,
DBA SCOTT CORRIDAN DESIGN

Chapter 11

Case No. 22-50366 (HLB)

Debtor.
-----X

**MOTION OF SAVANNAH SCOVILLE
FOR AN ORDER COMPELLING DEBTOR'S
IMMEDIATE PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

TO THE HONORABLE HILARY L. BARNES,
UNITED STATES BANKRUPTCY JUDGE:

SAVANNAH SCOVILLE ("Scoville"), pro se, as and for her motion (the "Motion") for entry of an Order, pursuant to §§ 105(a) and 503(b) of title 11 of the United States Code (the "Bankruptcy Code"), directing Scott A. Corridan, the debtor and debtor-in-possession herein (the "Debtor"), to immediately pay the administrative expense claim held by Scoville, respectfully represents and alleges as follows:

BACKGROUND

1. On July 12, 2022 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court and an Order for Relief was entered. The Debtor continues to manage its business and affairs as a

debtor-in-possession. This case was originally filed as chapter 11, and the Movant believes all work was performed during the period before conversion to chapter 7.

2. The Debtor has an ownership interest in a \$2,500,000 home located three blocks from the banks of Lake Tahoe, several cars including a \$100,000 2021 Mercedes and a \$30,000 2018 Range Rover and two horses, and, **undisclosed in its schedules, a \$4,000,000 dollar equestrian horse farm/hotel** nestled in Mount Juliet Estate, Ireland, discussed *infra*.

3. Scoville was retained on or about February 1, 2023 by Debtor to design and improve the Lake Tahoe house and other projects of Debtor's on-going business enterprise. ("**Exhibit F**") On July 14 2023, Scoville filed a proof of claim in the Debtor's case on account with respect to its administrative expense claim. (See Claim No. 26; attached hereto "**Exhibit A**") (the "Scoville Administrative Claim").

JURISDICTION AND VENUE

4. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief requested herein are §§ 105(a) and 503(b) of the Bankruptcy Code.

REQUEST FOR RELIEF

5. By this Motion, Scoville respectfully requests the entry of an Order directing the Debtor to immediately pay the Scoville Administrative Claim pursuant to §§ 105(a) and 503(b) of the Bankruptcy Code. At the outset, it cannot be disputed that

Scoville holds a valid, administrative expense claim against the Debtor in the amount of \$9,740.00 on account of the professional fees and expenses incurred by her, post-petition. Debtor has not listed this claim on his amended schedules.

6. However, the Debtor attempted to make payment, by means of a **bounced a check** in the amount of \$6,000.00, as partial payment, drawn on a Bank of the West account, 070143342, check No. 985015, (attached “**Exhibit B**”), and **not designated as a debtor-in-possession (DIP) account**. It is unknown how many checks Debtor has drawn on this undisclosed account.

7. Although § 503(b) does not provide any date for the payment of an administrative expense claim, it is within the bankruptcy court’s discretion to direct that such claims be paid immediately. *See, e.g., In re Continental Airlines, Inc.*, 146 B.R. 520, 531 (Bankr. D. Del. 1992). In determining whether such an exercise of discretion is appropriate, bankruptcy courts in this district typically weigh: (1) the prejudice to the debtor; (2) the hardship to the individual claimant; and (3) the potential detriment to other creditors. *See, e.g., In re Garden Ridge Corp.*, 323 B.R. 136, 143 (Bankr. D. Del. 2005).

8. Respectfully, the likelihood of any prejudice to the Debtor in immediately paying the Scoville Administrative Claim is minimal. Debtor told Scoville that he had recently purchased the Horse Farm located at MJ Equestrian, Mount Juliet Equestrian Centre, Mount Juliet Estate, Thomastown, Co. Kilkenny, R95 K7DA, Ireland (transcribed voicemail, attached “**Exhibit C**”). <https://mjequestrian.com/facilities>. The facility he purchased has livery stables, a helicopter landing pad, a 5-star hotel, an all-weather

jumping arena, air conditioned tack room, and other amenities. Is Debtor planning on leaving the country and set up shop in Ireland?

9. According to the voicemail and oral conversation Scoville directly had with Debtor, the Debtor confirmed:

"Hey it's Scott:

...just calling to check in about this banking issue, ...I've made a mistake to kinda keep a simplistic picture, I had to do things with **funds to verify for the purchase [of the horse farm] in Ireland,**

I didn't properly account for the ramifications of my IRS payment, those went through and **it shorted the account,** ... the wires didn't go through.

...I can't pull from client accounts where we've got cash ...I'm going to go to Fidelity in the morning and pull from investment accounts

..I've got to take these funds out of the investment account and put them into operating to get payroll funded.
("Exhibit D").

10. These undisclosed bank accounts, operating accounts, client accounts, Irish horse farm, and other related accounts not otherwise mentioned in the Petition and his amended schedule do not appear anywhere.

11. The Debtor claimed, and confirmed in his voicemail, he paid for his horse farm and IRS bill leaving Scoville nothing, a single woman.

12. Debtor, instead of actually making arrangements for payments to Scoville, he **threatened her** with her with attorney Kevin Darby, the Chapter 7 lawyer, claiming he would sue Scoville "filing suit against [her] **seeking damages of \$500,000** for multiple issues you'll review one the filing is complete." (see attached threat email, "**Exhibit E**"). Yet another "claim" not listed in Debtor's dubious schedules.

13. To the contrary, Scoville will be harmed significantly if immediate payment is not received for the professional services and expenses which she, in good faith, incurred on behalf of the Debtor. Finally, it is unlikely that the immediate payment of the Scoville Administrative Claim will harm other creditors since all of the Debtor's administrative expense claims will ultimately need to be paid by the Debtors. Accordingly, the Court should direct the Debtor to immediately pay Scoville the sum of \$9,740.00.

RESERVATION OF RIGHTS

14. Scoville hereby expressly reserves the right to amend or supplement this Motion at any time, in any respect and for any reason, including but not limited to, amendments for the purposes of: (a) fixing, increasing, or amending the amounts claimed; and (b) adding or amending documents and other information and further describing the claim.

15. This Motion is submitted without prejudice to Scoville's filing of additional requests for allowance and/or proofs of claim for any additional claims against the Debtor of any kind or nature, including, without limitation, claims for administrative expenses, interest, late charges, attorneys' fees, costs and expenses, and any and all other charges and obligations reserved under the applicable agreements, instruments and other transaction documents, and claims for reimbursement in amounts that are not fully ascertainable at this time.

16. Scoville's submission of this Motion is not intended to be and shall not be deemed to be or construed as a waiver or release of any right to claim specific assets; any rights of setoff, recoupment, or counterclaim; or any other rights, rights of action, causes of action, or claims, whether existing now or hereinafter arising, that Scoville has or may have against the Debtor or any other person, or persons, and Scoville expressly reserves all such rights.

17. In making this Motion, Scoville does not submit to the jurisdiction of the Bankruptcy Court for any purpose other than with respect to said Motion. This Motion is not intended to be, and shall not be construed as: (a) an election of remedies; (b) a waiver of any past, present or future defaults; or (c) a waiver of limitation of any rights, remedies, claims or interests of Scoville.

WHEREFORE, Scoville respectfully requests that the Court grant the relief sought herein together with such other and further relief as may be just and proper.

18. Dated: Incline Village, Nevada
19. July 14, 2023
20.
21.
22.

Savannah Scoville

By:


Savannah Scoville, pro se

PO Box 4805
Incline Village, NV

23.
24.
89451-9997

savannahscoville@gmail.com
(712) 577-1496

Exhibit A

B10 (Official Form 10) (04/13)

UNITED STATES BANKRUPTCY COURT		District of Nevada	PROOF OF CLAIM
Name of Debtor: Scott A. Corridan		Case Number: 22-50366-HLB	
NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing. You may file a request for payment of an administrative expense according to 11 U.S.C. § 503.			
Name of Creditor (the person or other entity to whom the debtor owes money or property): Savannah R. Scoville			
Name and address where notices should be sent: Savannah R. Scoville PO Box 4805, Incline Village NV 89451 Telephone number: (712) 577-1496 email: savannahscoville@gmail.com		<p style="text-align: center;">COURT USE ONLY</p> <input type="checkbox"/> Check this box if this claim amends a previously filed claim. Court Claim Number: _____ (If known) Filed on: _____	
Name and address where payment should be sent (if different from above): Telephone number: _____ email: _____		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars.	
1. Amount of Claim as of Date Case Filed: \$ <u>9,740.00</u> If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.			
2. Basis for Claim: <u>Unpaid invoices for contracted interior design services</u> (See instruction #2)			
3. Last four digits of any number by which creditor identifies debtor: _____	3a. Debtor may have scheduled account as: _____ (See instruction #3a)	3b. Uniform Claim Identifier (optional): _____ (See instruction #3b)	
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: _____ Value of Property: \$ _____ Annual Interest Rate _____ % <input type="checkbox"/> Fixed or <input type="checkbox"/> Variable (when case was filed)		Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____	
5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507 (a). If any part of the claim falls into one of the following categories, check the box specifying the priority and state the amount. <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507 (a)(1)(A) or (a)(1)(B). </div> <div style="width: 30%;"> <input type="checkbox"/> Wages, salaries, or commissions (up to \$12,475*) earned within 180 days before the case was filed or the debtor's business ceased, whichever is earlier – 11 U.S.C. § 507 (a)(4). </div> <div style="width: 30%;"> <input type="checkbox"/> Contributions to an employee benefit plan – 11 U.S.C. § 507 (a)(5). </div> </div> <div style="display: flex; justify-content: flex-end; margin-top: 10px;"> Amount entitled to priority: \$ <u>9,740.00</u> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 30%;"> <input type="checkbox"/> Up to \$2,775* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. § 507 (a)(7). </div> <div style="width: 30%;"> <input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. § 507 (a)(8). </div> <div style="width: 30%;"> <input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. § 507 (a)(____). </div> </div>			
<i>*Amounts are subject to adjustment on 4/01/16 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.</i>			
6. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)			

B10 (Official Form 10) (04/13)

2

7. Documents: Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. If the claim is secured by the debtor's principal residence, the Mortgage Proof of Claim Attachment is being filed with this claim. (See instruction #7, and the definition of "redacted".)

DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.

If the documents are not available, please explain:

8. Signature: (See instruction #8)

Check the appropriate box.

☒ I am the creditor. ☐ I am the creditor's authorized agent. ☐ I am the trustee, or the debtor, or their authorized agent. ☐ I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.)
(See Bankruptcy Rule 3004.)

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.

Print Name: Savannah Scoville

Title: _____

Company: _____

Address and telephone number (if different from notice address above): _____

Savannah Scoville
(Signature)

07/14/2023

(Date)

Telephone number: _____ email: _____

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

INSTRUCTIONS FOR PROOF OF CLAIM FORM

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor, exceptions to these general rules may apply.

Items to be completed in Proof of Claim form

Court, Name of Debtor, and Case Number:

Fill in the federal judicial district in which the bankruptcy case was filed (for example, Central District of California), the debtor's full name, and the case number. If the creditor received a notice of the case from the bankruptcy court, all of this information is at the top of the notice.

Creditor's Name and Address:

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

1. Amount of Claim as of Date Case Filed:

State the total amount owed to the creditor on the date of the bankruptcy filing. Follow the instructions concerning whether to complete Items 4 and 5. Check the box if interest or other charges are included in the claim.

2. Basis for Claim:

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on delivering health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information. You may be required to provide additional disclosure if an interested party objects to the claim.

3. Last Four Digits of Any Number by Which Creditor Identifies Debtor:

State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor.

3a. Debtor May Have Scheduled Account As:

Report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the debtor.

3b. Uniform Claim Identifier:

If you use a uniform claim identifier, you may report it here. A uniform claim identifier is an optional 24-character identifier that certain large creditors use to facilitate electronic payment in chapter 13 cases.

4. Secured Claim:

Check whether the claim is fully or partially secured. Skip this section if the

claim is entirely unsecured. (See Definitions.) If the claim is secured, check the box for the nature and value of property that secures the claim, attach copies of lien documentation, and state, as of the date of the bankruptcy filing, the annual interest rate (and whether it is fixed or variable), and the amount past due on the claim.

5. Amount of Claim Entitled to Priority Under 11 U.S.C. § 507 (a).

If any portion of the claim falls into any category shown, check the appropriate box(es) and state the amount entitled to priority. (See Definitions.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

6. Credits:

An authorized signature on this proof of claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

7. Documents:

Attach redacted copies of any documents that show the debt exists and a lien secures the debt. You must also attach copies of documents that evidence perfection of any security interest and documents required by FRBP 3001(c) for claims based on an open-end or revolving consumer credit agreement or secured by a security interest in the debtor's principal residence. You may also attach a summary in addition to the documents themselves. FRBP 3001(c) and (d). If the claim is based on delivering health care goods or services, limit disclosing confidential health care information. Do not send original documents, as attachments may be destroyed after scanning.

8. Date and Signature:

The individual completing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what constitutes a signature. If you sign this form, you declare under penalty of perjury that the information provided is true and correct to the best of your knowledge, information, and reasonable belief. Your signature is also a certification that the claim meets the requirements of FRBP 9011(b). Whether the claim is filed electronically or in person, if your name is on the signature line, you are responsible for the declaration. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. If the claim is filed by an authorized agent, provide both the name of the individual filing the claim and the name of the agent. If the authorized agent is a servicer, identify the corporate servicer as the company. Criminal penalties apply for making a false statement on a proof of claim.

DEFINITIONS**Debtor**

A debtor is the person, corporation, or other entity that has filed a bankruptcy case.

Creditor

A creditor is a person, corporation, or other entity to whom debtor owes a debt that was incurred before the date of the bankruptcy filing. See 11 U.S.C. §101 (10).

Claim

A claim is the creditor's right to receive payment for a debt owed by the debtor on the date of the bankruptcy filing. See 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Proof of Claim

A proof of claim is a form used by the creditor to indicate the amount of the debt owed by the debtor on the date of the bankruptcy filing. The creditor must file the form with the clerk of the same bankruptcy court in which the bankruptcy case was filed.

Secured Claim Under 11 U.S.C. § 506 (a)

A secured claim is one backed by a lien on property of the debtor. The claim is secured so long as the creditor has the right to be paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment is a lien.

A claim also may be secured if the creditor owes the debtor money (has a right to setoff).

Unsecured Claim

An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.

Claim Entitled to Priority Under 11 U.S.C. § 507 (a)

Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.

Redacted

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. A creditor must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

Evidence of Perfection

Evidence of perfection may include a mortgage, lien, certificate of title, financing statement, or other document showing that the lien has been filed or recorded.

INFORMATION**Acknowledgment of Filing of Claim**

To receive acknowledgment of your filing, you may either enclose a stamped self-addressed envelope and a copy of this proof of claim or you may access the court's PACER system (www.pacer.psc.uscourts.gov) for a small fee to view your filed proof of claim.

Offers to Purchase a Claim

Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court or the debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001(e), any applicable provisions of the Bankruptcy Code (11 U.S.C. § 101 *et seq.*), and any applicable orders of the bankruptcy court.


EXHIBIT B

Bounced Check image

6/1/23, 11:42 AM

Returned Deposit Details - chase.com

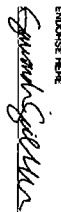
The paying bank returned the check unpaid.

Account: PAYMENT		\$8,000.00	
SCOTT CORRIGAN DBA SCOTT CORRIGAN DESIGN 120 COUNTRY CLUB DRIVE SUITE 7 INCLINE VILLAGE, NV 89461-4360		Please Direct Any Questions To (800) 243-2808 Online BB Payment Processing Center	
MEMO: May 1, 2023 1st Ctr Invoice		7/8/1211 0000985015 May 25, 2023	
BANK OF THE WEST <small>1194 9042 RPY 07 RDR 171 47014342-2 00000000</small>			
Pay SIX THOUSAND AND 00/100		DOLLARS	
TO THE ORDER OF SAVANNAH SCOVILLE PO BOX 10984 ZEPHYR COVE, NV 89449-2084		*****8,000.00	
 985015 12110078 07014334 21		Void After 180 DAYS. Signature On File This check has been authorized by your depositor	

Account # 70143342
 Routing # 12110078
 Check # 000000985015
 Reason for return Insufficient funds

<https://secure2go.chase.com/web/auth/dashboard#/dashboard/overview/Accounts/overview/multiProduct?flyout=transactionImageDetails&depositAccountServicingArea:896024553,1790856753>

2/3

NSF 1st		485510991	
ChaseBank 052602 275281 962740017389 DO NOT WRITE STAMP OR SIGN BELOW THIS LINE RESERVED FOR FINANCIAL INSTITUTION USE		ENDORSE HERE 	

Account # 70143342
 Routing # 12110078
 Check # 000000985015
 Reason for return Insufficient funds

<https://secure2go.chase.com/web/auth/dashboard#/dashboard/overview/Accounts/overview/multiProduct?flyout=transactionImageDetails&depositAccountServicingArea:896024553,1790856753>

2/3

EXHIBIT C

Irish Horse Farm

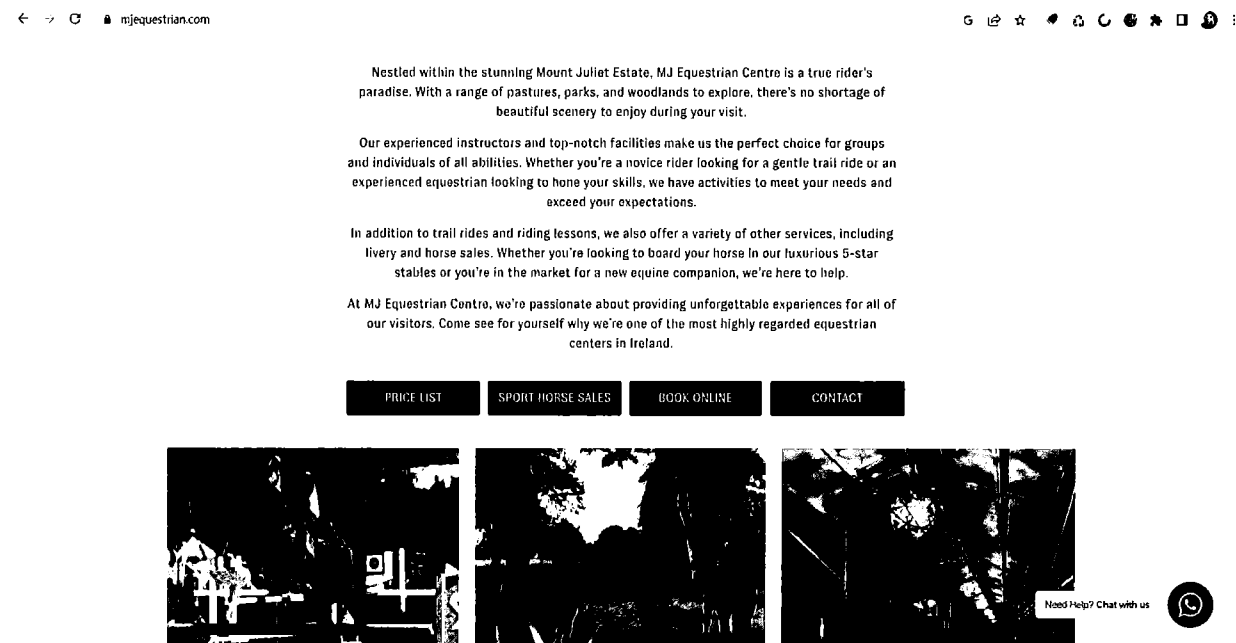


EXHIBIT D
VOICEMAIL TRANSCRIPT

Transcribed voicemail of Scott Corridan:

"Hey it's Scott,

just calling to check in about this banking issue, [it's] 4:30, I'm gonna be quick because I'm coming up [I-]395 and I'm likely to lose reception here today.

..., this is on me, I've made a mistake to kinda keep a simplistic picture, I had to do things with **funds to verify for the purchase in Ireland**, I didn't properly account for the ramifications of my IRS payment, those went through and **it shorted the account**, it's not overdrawn but it just made it short enough on the operating account to where the wires didn't go through.

And that all happened Monday night, attached to Friday's business. So that's what the problem is, it's fine, **I can't pull from client accounts where we've got cash** and whatnot. I'm going to go to Fidelity in the morning and **pull from investment accounts** and then there'll be a cashiers check, uhh, put those into the operating and then reinstitute the wire to you.

While I was online talking to the bank, this is minimal by far for sure, but umm, your reimbursements were scheduled to go out by wire on Friday. I just Zelled it to you. Umm, so just check your account on that it's like 90 bucks it's not a big deal. So anyways just know that, so that's been taken care of. And then **I've got to take these funds out of the investment account and put them into operating to get payroll funded**, and that I'm doing in the morning. I have some dental surgery in the morning, that should be done by noon or 12:30, so if there's something that I've got to do I'll do it after that, and the reason that's important is because the wire cut off is 2pm. So I'm going to Fidelity, then to the bank, I've got surgery, hopefully everything's taken care of before I go into surgery, if it's not then I'm circling back by 12:30 to get things done by the 2pm cut off.

Umm, that's what I know. Call me back, thanks."

EXHIBIT E
THREAT EMAIL FROM DEBTOR

Violations of Non Disclosure, Slander, Libel, other ... (42 k) 

"scottc@scottcorridan.net" [scottc@scottcorridan.net]

Sent: Tue, 7:54 am

To: "savannahscoville@gmail.com"

Good morning Savannah,

Kevin Darby forwarded this to me as he won't have need to engage with you since he's managing the Ch. 11 restructuring and your issue exists outside of that.

You mentioned in early May that you have Counsel. Please refer your Counsel to me so that I can introduce him/her to Carole Pope who will manage your issue.

Of note, we will be filing suit against you seeking damages of \$ 500,000.00 for multiple issues you'll review once the filing is complete. Please make sure your Counsel gets in touch.

Thank you,

SCOTT CORRIDAN
ASSOCIATES

 **INTERIOR DESIGN**  **AND FURNISHINGS**

EXHIBIT F
RETENTION LETTER FROM DEBTOR

03/01/2023
Savannah Scoville
418A Kingsbury Grade
Stateline, NV 89449

Re: Verification of Employment for Savannah Scoville

To Whom It May Concern:

Please accept this letter as confirmation that Savannah Scoville has been employed with Scott Corridan Design since 02/01/2023.

Currently, Savannah Scoville holds the Title of Assistant Designer and works on a full-time basis for 40 hours per week at an hourly rate of \$37.50. Savannah's prospects for continued employment are strong.

If you have any questions or require further information, please do not hesitate to contact me at (775) 548-5000.

Sincerely,

Scott Corridan
Owner/Principal Designer
Scott Corridan Design



Signature:

Date: 3/1/23